

89878

RECEIVED**Chevron**

MAY 08 1995

OFFICE OF THE DIRECTOR
WSTM DIVISION

May 2, 1995

ChemicalEnvironment & Health Protection
6001 Bollinger Canyon Road
San Ramon, CA 94583Ms. Julie Warren
Missouri Department of Natural Resources
Division of Environmental Quality
P. O. Box 176
Jefferson City, MO 65102

Site:	Chevron Chem.
#: MO	DO06272354
Week:	17.9
Other:	MDNR
	5-2-95

Maryland Heights, MO Site: Proposal for Change in Site Use

Dear Ms. Warren:

This letter represents Chevron Chemical Company's proposal for modified use of the remaining facilities (primarily buildings) at our property located at #2497 Adie Road.

As you described in your letter to Cathy Barrett (EPA) dated June 2, 1994, MDNR's written approval is needed prior to selling, conveying, transferring or substantially changing the site/land-use. While we are not certain that our proposed leasing of the buildings meets these criteria, we are submitting this proposal so that MDNR's needs may be met without delaying the proposed lease (effective June 1, 1995).

I. BACKGROUND

From 1948 through 1994, Chevron operated on the plant property which it owns. Chevron's operations involved the blending, packaging, and warehousing of a variety of products, mostly pesticides and herbicides, for both agricultural and 'Home & Garden' uses. In approximately 1981, Chevron notified the EPA that fire-debris was buried under several of the buildings constructed since a fire in 1952.

Since 1981, Chevron has worked closely with the EPA and the MDNR to monitor groundwater, to perform various environmental evaluations, and to complete several remedial projects. A final surface-paving project is now scheduled for completion this Summer. This work was designed to prevent worker contact with contaminated soils, as well as to contain the soils and prevent stormwater percolation on-site. The site is on the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Sites in Missouri. The EPA has monitored Chevron's environmental work via a Consent Agreement with Chevron under the Comprehensive Environmental Cleanup and Responsibility Act (CERCLA).

In the 3Q94, Chevron ceased chemical handling operations at the plant. At that time, Monsanto, the recent purchaser of Chevron's former ORTHO/Consumer Products Division, removed all the raw materials and products, and most of the processing and storage equipment. From September



through December 1994, all the site buildings and any remaining equipment were cleaned of process residues. The few in-floor steel and concrete sumps were filled with cement.

On April 20, I sent you a copy of the cleanup report provided by the contractor, Heritage Remediation/Engineering Inc. As described in the report, Heritage conducted a thorough cleanup of all the building surfaces, employing various environmental/industrial cleanup techniques depending on the surface and contaminants of concern. In some cases, follow-up cleanings were conducted to assure a thorough cleaning. Cleaning methods included power washing (i.e., high-pressure, hot water jets), scraping, detergent-scrubbing, vacuuming, sweeping, and mopping.

II. POST-CLEANUP MONITORING

As each building was cleaned, a team of inspectors from Heritage and Chevron inspected the work. The teams determined whether or not all visible and shallow-surface residues had been removed. If not, areas were re-cleaned and inspected.

A comprehensive air monitoring program was designed and implemented to confirm that the buildings were safe for unrestricted commercial or industrial use. Based on the chemicals historically handled in each area, indicator-chemicals was selected. The indicator-chemicals (i.e., those to be monitored) were selected based primarily on their relative toxicity, persistence/half-life, and the availability of health standards.

Each chemical-handling area, along with the main worker locker-rooms, were then isolated and prepared for "aggressive air monitoring". In this program, all doors, windows and powered ventilators were closed or disconnected. Fans were installed to aggressively mobilize and circulate any remaining residues. Air samples were then collected at a distance from the floor approximating the workers' breathing zones.

III. POST-CLEANUP RESULTS

By creating a poorly-ventilated, air-disturbed environment, and by sampling for the more-hazardous chemicals, a highly-conservative and worst-case scenario was created. In most cases, the concentrations of chemicals were confirmed to be "non-detectable", even at one to three orders of magnitude below the published health standard (OSHA PEL/TLV).

Second cleanings were conducted in areas where visual or analytical inspections suggested anything other than a very effective cleanup. Building "A" is now being re-cleaned and monitored, to confirm that these levels are conservatively below the health standards. This data will be forwarded shortly.

The data from the above-described monitoring program are attached.

IV. PROPOSED NEW SITE USES

Chevron has received a preliminary lease proposal from Cerro Copper Products Co.. Cerro proposes to lease the northern-most train of buildings, including buildings: C, D, D-Extension, J, F, (former) Maintenance, and M.

Cerro proposes to store their products, copper tubing, in these warehouses. Cerro estimates that there will be approximately 10 workers on-site. Cerro has proposed to begin using the site on June 1, 1995.

Chevron continues to receive and evaluate proposals from other parties interested in some or all of the buildings on-site. We anticipate leasing the balance of the buildings not needed by Cerro.

V. MDNR'S CRITERIA FOR ALLOWING NEW SITE USES

The following discussion addresses the four criteria listed in your June 2, 1994 letter. It is noteworthy that Chevron is proposing only continuing commercial/industrial use, not a change in land-use. Chevron will continue to own the premises and will retain responsibility for the ongoing sub-surface programs.

1. Will the proposed site uses cause "a spread of contamination over additional portions of the site or off-site"?

The proposed leases by Chevron of the clean buildings are unrelated to Chevron's continuing management of the subsurface residues which have caused the site to be listed on the state registry. The building interiors will be confirmed as clean and safe prior to leasing. The proposed leases will in no way result in the spreading of the sub-surface contamination.

Continued beneficial use of the premises is essential to keeping the facilities properly secured and maintained. The proposed uses of the site will prevent un-authorized entry into the facilities and will allow the site to maintain its status in the area as a secure and welcome asset.

2. Will the proposed site uses cause "an increase in human exposure to the hazardous material"?

For the same reasons as are discussed under question #1, appropriate and beneficial site uses will not increase human exposure to any site residues. The proposed uses of the site will prevent un-authorized entry into the facilities and will allow the site to maintain its status in the area as a secure and welcome asset.

3. Will the proposed site uses cause "an increase in adverse environmental impacts"?

The proposed site uses do not impact the subsurface residues. Chevron is now soliciting bids for the asphalt capping of essentially all areas on-site which remain un-covered by either buildings or existing paving.

For the same reasons as are discussed under question #1, appropriate and beneficial site uses will not increase adverse environmental impacts at the site. In fact, the proposed uses of the site will prevent un-authorized entry into the facilities and will allow the site to be maintained such that the sub-surface residues are contained and secured.

4. Will the proposed site uses result in "a situation making potential remedial actions to correct problems at the site more difficult to undertake or complete"?

Chevron will continue to manage the ongoing subsurface programs. The proposed leases will not involve substantial alterations to the premises. The lease agreements will communicate to the prospective tenants Chevron's needs for access to the site for environmental monitoring, etc. The lease agreements will also provide for Chevron's intrusive work on the premises, should that ever be deemed necessary. The proposed leases will also restrict the tenants' rights to modify the facilities, especially where such work would involve sub-surface soils.

VI. CONCLUSIONS & RECOMMENDATIONS

Julie, we will appreciate a prompt review and response from MDNR regarding our proposals. As discussed above, Chevron intends to assure that the premises are thoroughly cleaned and safe for unrestricted commercial uses.

Chevron is not proposing to transfer ownership nor sub-surface responsibility. Since we are not certain that the MDNR must approve of the proposed leases, we are request your prompt clarification. If MDNR must approve of such site uses, we request a prompt response, compatible with Cerro's proposed June 1, 1995 move-in date.

Through discussions with the EPA, we understand that they strongly support our efforts to return the site to beneficial use. Our local business neighbors and the city of Maryland Heights have expressed strong support for continued beneficial use of the site.

I am prepared to meet with you promptly or to arrange for you to meet with my local consultants, as necessary, to address any questions you may have. We will appreciate your consideration of this proposal and the June 1 timing needed by Cerro Copper.

Please call me anytime at ph: 510-842-2087.

Sincerely,



Anthony J. Maciey
Senior Environmental Projects Engineer

Attachments

cc: Ms. Catherine M. Barrett
Remedial Project Manager, Superfund Branch
U.S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Larry Tiehes
Product Manager
Cerro Copper Products Co.
P. O. Box 66800
St. Louis, MO 63166-6800

POST-CLEANUP DATA: #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

Maintenance Warehouse	Parathion mg/m^3	Dursban mg/m^3	Sevin mg/m^3	DDT mg/m^3	Aldrin mg/m^3	Diquat mg/m^3	Paraquat mg/m^3	Arsenic mg/m^3	Captan mg/m^3	Diazinon mg/m^3	Difolatin mg/m^3
MW-1-A	<0.007	<0.007									
MW-1-B	<0.007	<0.007									
MW-2-A			<0.07								
MW-2-B			<0.07								
MW-3-A				<0.0002							
MW-3-B				<0.0002							
MW-4-A					<0.0001						
MW-4-B					<0.0001						
MW-5-A						<0.02	<0.02				
MW-5-B						<0.02	<0.02				
MW-6-A								<0.001			
MW-6-B								<0.001			
D Dock Extension											
DDE-1-A		<0.007									
DDE-1-B		<0.007									
DDE-2-A			<0.07								
DDE-2-B			<0.07								
DDE-3-A				<0.0002							
DDE-3-B				<0.0002							
DDE-4-A								<0.001			
DDE-4-B								<0.001			
DDE-1-1				0.035							
BUILDING C											
C-1-A		<0.007								<0.007	
C-1-B		<0.007								<0.007	
C-2-A									<0.07		
C-2-B									<0.07		
C-3-A				<0.0002							
C-3-B				<0.0002							
C-4-A								<0.001			
C-4-B								<0.001			
BUILDING D											
D-1-A			<0.07						<0.07		<0.08
D-1-B			<0.07						<0.07		<0.08
D-2-A				<0.0002							
D-2-B				<0.0002							
D-3-A								<0.001			
D-3-B								<0.001			
BUILDING J											
J-1-A		<0.007									
J-1-B		<0.007									
J-2-A			<0.07								
J-2-B			<0.07								
J-3-A				<0.0002							
J-3-B				<0.0002							

POST-CLEANUP DATA: #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

J-4-A								<0.001			
J-4-B								<0.001			
	Parathion mg/m^3	Dursban mg/m^3	Sevin mg/m^3	DDT mg/m^3	Aldrin mg/m^3	Diquat mg/m^3	Paraquat mg/m^3	Arsenic mg/m^3	Captan mg/m^3	Diazinon mg/m^3	Difolatin mg/m^3
BUILDING F											
F-1-A	<0.007	<0.007								<0.007	
F-1-B	<0.007	<0.007								<0.007	
F-2-A			<0.07								
F-2-B			<0.07								
F-3-A				<0.0002							
F-3-B				<0.0002							
F-4-A						<0.02	<0.02				
F-4-B						<0.02	<0.02				
F-5-A								<0.001			
F-5-B								<0.001			

POST-CLEANUP DATA; #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

LAB AREA	Parathion mg/m^3	Dursban mg/m^3	Sevin mg/m^3	DDT mg/m^3	Aldrin mg/m^3	Diquat mg/m^3	Paraquat mg/m^3	Arsenic mg/m^3	Captan mg/m^3	Diazinon mg/m^3	Difolatin mg/m^3
LA-1-A	<0.007	<0.007									
LA-1-B	<0.007	<0.007									
LA-2-A			<0.07								
LA-2-B			<0.07								
LA-3-A				<0.0001							
LA-3-B				<0.0001							
LA-4-A					<0.0001						
LA-4-B					<0.0001						
LA-5-A						<0.02	<0.02				
LA-5-B						<0.02	<0.02				
LA-6-A								<0.001			
LA-6-B								<0.001			
Male Lockers											
ML-1-A	<0.007	<0.007									
ML-1-B	<0.007	<0.007									
ML-2-A			<0.07								
ML-2-B			<0.07								
ML-3-A				<0.0001							
ML-3-B				<0.0001							
ML-4-A					<0.0001						
ML-4-B					<0.0001						
ML-5-A						<0.02	<0.02				
ML-5-B						<0.02	<0.02				
ML-6-A								<0.001			
ML-6-B								<0.001			
Female Lockers											
FL-1-A	<0.007	<0.007									
FL-1-B	<0.007	<0.007									
FL-2-A			<0.07								
FL-2-B			<0.07								
FL-3-A				<0.0001							
FL-3-B				<0.0001							
FL-4-A					<0.0001						
FL-4-B					<0.0001						
FL-5-A						<0.02	<0.02				
FL-5-B						<0.02	<0.02				
FL-6-A								<0.001			
FL-6-B								<0.001			

POST-CLEANUP DATA; #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

LAB LOFT	Parathion mg/m ³	Dursban mg/m ³	Sevin mg/m ³	DDT mg/m ³	Aldrin mg/m ³	Diquat mg/m ³	Paraquat mg/m ³	Arsenic mg/m ³	Captan mg/m ³	Diazinon mg/m ³	Difolatin mg/m ³
LL-1-A	<0.007	<0.007									
LL-1-B	<0.007	<0.007									
LL-2-A			<0.07								
LL-2-B			<0.07								
LL-3-A				0.00021							
LL-3-B				0.00035							
LL-4-A					<0.0001						
LL-4-B					<0.0001						
LL-5-A						<0.02	<0.02				
LL-5-B						<0.02	<0.02				
LL-6-A								<0.001			
LL-6-B								<0.001			
BUILDING M											
M-1-A			<0.07								
M-1-B			<0.07								
M-2-A				<0.0001							
M-2-B				<0.0001							
M-3-A						<0.02	<0.02				
M-3-B						<0.02	<0.02				
M-4-A								<0.001			
M-4-B								<0.001			

POST-CLEANUP DATA; #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

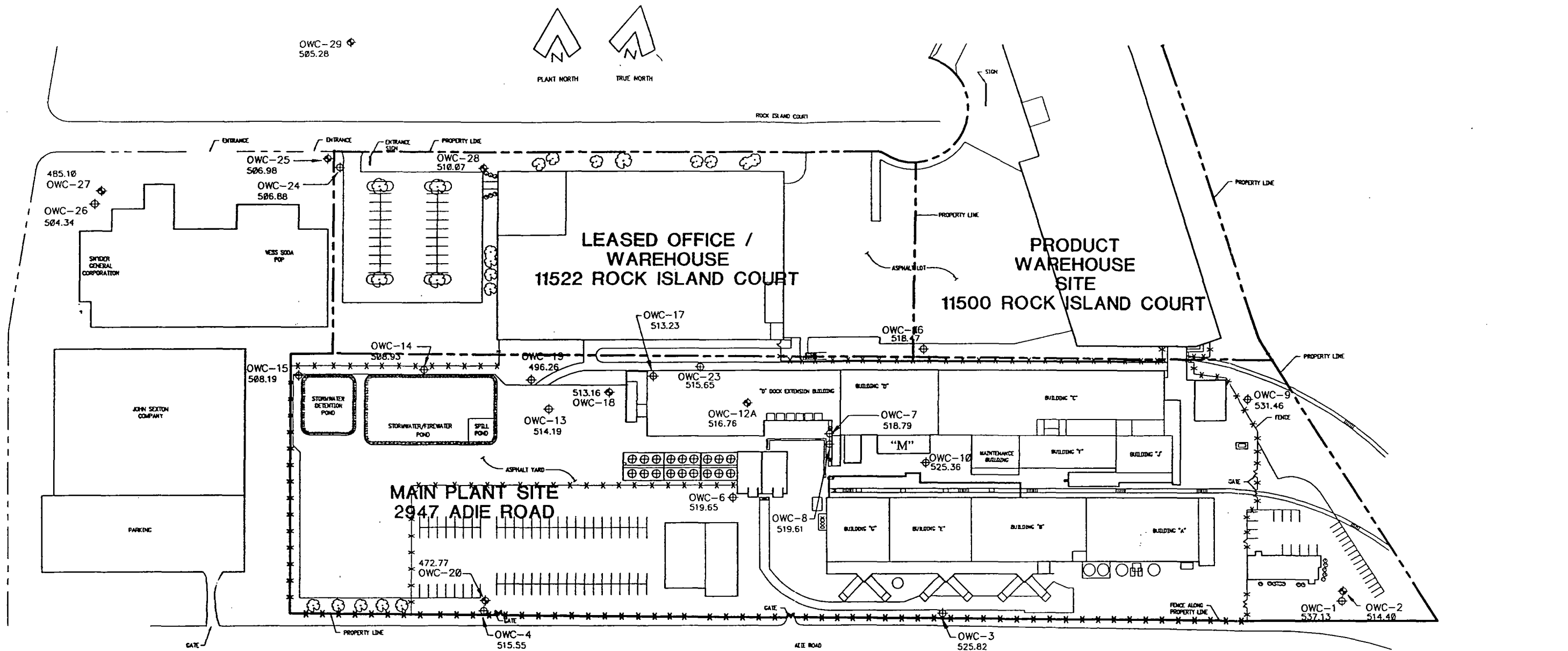
BUILDING E	Captan mg/m^3	Difolatan mg/m^3	Sevin mg/m^3	Heptachlor mg/m^3	DDT mg/m^3	Arsenic mg/m^3	Endrin mg/m^3	Aldrin mg/m^3	Parathion mg/m^3			
E-1-A									<0.007			
E-1-B									<0.007			
E-2-A					<0.0002							
E-2-B					<0.0002							
E-3-A								<0.00002				
E-3-B								<0.00002				
E-4-A							<0.00002					
E-4-B							<0.00002					
E-5-A							<0.00002					
E-5-B							<0.00002					
E-6-A						<0.001						
E-6-B						<0.001						
BUILDING G												
G-1-A					<0.0002							
G-1-B					<0.0002							
G-2-A						<0.001						
G-2-B						<0.001						

POST-CLEANUP DATA: #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

BUILDING A	Captan mg/m^3	Difolatan mg/m^3	Sevin mg/m^3	Heptachlor mg/m^3	DDT mg/m^3	Arsenic mg/m^3	Diazinon mg/m^3	Dursban mg/m^3				
A-1-A												
A-1-B												
A-2-A												
A-2-B												
A-3-A												
A-3-B												
A-4-A												
A-4-B												
A-5-A												
A-5-B												
BUILDING B												
B-1-A	<0.07	<0.08	<0.07									
B-1-B	<0.07	<0.08	<0.07									
B-2-A				<0.00002	<.0002							
B-2-B				<0.00002	<.0002							
B-3-A						<0.001						
B-3-B						<0.001						
B-4-A			<0.07									
B-4-B			<0.07									

POST-CLEANUP DATA: #2497 ADIE ROAD SITE (CHEVRON; 5/2/95)

BLANKS	Parathion mg/m^3	Dursban mg/m^3	Sevin mg/m^3	DDT mg/m^3	Aldrin mg/m^3	Diquat mg/m^3	Paraquat mg/m^3	Arsenic mg/m^3	Captan mg/m^3	Diazinon mg/m^3	Difolatin mg/m^3
BL-1-A	<0.007	<0.007									
BL-1-B	<0.007	<0.007									
BL-1-C	<0.007	<0.007									
BL-2-A			<0.07								
BL-2-B			<0.07								
BL-2-C			<0.07								
BL-3-A				<0.0001							
BL-3-B				<0.0001							
BL-3-C				<0.0001							
BL-4-A								<0.001			
BL-4-B								<0.001			
BL-4-C								<0.001			
BL-5-A					<0.0001						
BL-5-B					<0.0001						
BL-5-C					<0.0001						
BL-6-A						<0.02	<0.02				
BL-6-B						<0.02	<0.02				
BL-6-C						<0.02	<0.02				



LEGEND:

- PROPERTY LINE
- *** FENCE LINE

MONITORING WELL LOCATION AND NUMBER:

- ⊕ OWC-4 SHALLOW MONITORING WELL
- ⊕ OWC-20 DEEP MONITORING WELL
- 537.13 WATER LEVEL ELEVATION (FEET, MSL)

ORTHO-CHEVRON PLANT
MARYLAND HEIGHTS, MISSOURI

Woodward-Clyde Consultants
Engineers, Geologists, And Environmental Scientists

PLOT PLAN OF
CHEVRON CHEMICAL PROPERTIES
AND VICINITY

DRAWN: D.R.T.	DATE: 12/22/93	PROJECT NUMBER	FIG. NO.
CHECKED: <i>CH</i>	DATE: 1-21-94	13C11424	1

ACAD FILE: OCDWG29

81/21/94 15:23:37

M.A.L. SC: 1=1500